

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

QSL CORPORATION d/b/a  
WAXCESSORIES and  
CKQ DESIGNS, INC.,

Plaintiffs,

v.

FIGI ACQUISITION COMPANY, LLC,

Defendant.

---

Civil Action No. 05-10395-NG

**SUGGESTION OF BANKRUPTCY**

Please note that defendant Figi, LLC (*f/k/a* Figi Acquisition Company, LLC) is the subject of an involuntary petition for relief (a copy of which is attached as Exhibit A) under Chapter 7, Title 11 of the United States Code, which was filed by three of its creditors, Enseng Hong Kong Ltd., Venture Manufacturing Ltd., and Gladgem Industrial Ltd., on May 6, 2005. Accordingly, pursuant to 11 U.S.C. §362, the above-captioned action was automatically stayed by operation of law.

Dated: May 20, 2005

FIGI LLC

*By its attorneys,*

/s/ Erik Paul Belt  
Erik Paul Belt, BBO # 558620  
BROMBERG & SUNSTEIN LLP  
125 Summer Street  
Boston, Massachusetts 02110  
Tel: (617) 443-9292  
Facsimile: (617) 443-0004  
[ebelt@bromsun.com](mailto:ebelt@bromsun.com)

Of Counsel:

Peter J. Schulz, Esq.  
Phillip McKenney, Esq.  
GRECO TRAFICANTE & EDWARDS  
555 West Beech Street, Suite 500  
San Diego, CA 92101  
tel. (619) 234-3660  
fax. (619) 234-0626

02990/00501 387786.1

# **EXHIBIT A**

### Best Case Bankruptcy

FIGI LLC, a Delaware Limited

Name of Debtor Liability CompanyFORM 5 Involuntary Petition  
(6/92)Case No. \_\_\_\_\_  
(court use only)**TRANSFER OF CLAIM**

☐ Check this box if there has been a transfer of any claim against the debtor by or to any petitioner. Attach all documents evidencing the transfer and any statements that are required under Bankruptcy Rule 1003(a).

**REQUEST FOR RELIEF**

Petitioner(s) request that an order for relief be entered against the debtor under the chapter of title 11, United States Code, specified in this petition.

Petitioner(s) declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information, and belief.

X/s/ Michael Lin, President

Signature of Petitioner or Representative (State title)

ENSENG (H.K) LTD

Name of Petitioner

May 6, 2005

Date Signed

Name & Mailing  
Address of Individual  
Signing in Representative  
Capacity

Michael Lin, President  
Enseng (H.K) Ltd  
16/F., 29 Austin Road  
Tsim Sha TSui  
Kowloon, Hong Kong

X/s/ Paul J. Leeds

Signature of Attorney

May 6, 2005

Date

Paul J. Leeds

Name of Attorney Firm (If any)

Higgs, Fletcher & Mack LLP  
401 West A Street Suite 2600  
San Diego, CA 92101-7910

Address

Telephone No. (619) 236-1551X/s/ Paul Su, Manager

Signature of Petitioner or Representative (State title)

Venture Manufacturing Ltd.

Name of Petitioner

May 6, 2005

Date Signed

Name & Mailing  
Address of Individual  
Signing in Representative  
Capacity

Paul Su, Manager  
97 Robinson Road  
Block 2, 11C  
Hong Kong

X/s/

Signature of Attorney

May 6, 2005

Date

Name of Attorney Firm (If any)

Address

Telephone No.

X/s/ Chow Man, Marketing Manager

Signature of Petitioner or Representative (State title)

Gladgem Industrial Ltd

Name of Petitioner

May 6, 2005

Date Signed

Name & Mailing  
Address of Individual  
Signing in Representative  
Capacity

Chow Man, Marketing Manager  
Flat 17, 5/F, Hewlett Centre  
54 Hoi Yuen Road  
Kwun Tong  
Kowloon, Hong Kong

X/s/

Signature of Attorney

May 6, 2005

Date

Name of Attorney Firm (If any)

Address

Telephone No.

**PETITIONING CREDITORS**

Name and Address of Petitioner  
ENSENG (H.K) LTD  
16/F., 29 Austin Road  
Tsim Sha TSui  
Kowloon, Hong Kong

Nature of Claim  
**Amounts owed for goods manufactured and/or sold  
and delivered to Debtor**

Amount of Claim  
**138,270.12**

Name and Address of Petitioner  
Venture Manufacturing Ltd.  
97 Robinson Road  
Block 2, 11C  
Hong Kong

Nature of Claim  
**Amounts owed for goods manufactured and/or sold  
and delivered to Debtor**

Amount of Claim  
**165,476.56**

Name and Address of Petitioner  
Gladgem Industrial Ltd  
Flat 17, 5/F, Hewlett Centre  
54 Hoi Yuen Road  
Kwun Tong  
Kowloon, Hong Kong

Nature of Claim  
**Amounts owed for goods manufactured and/or sold  
and delivered to Debtor**

Amount of Claim  
**465,466.30**

Note: If there are more than three petitioners, attach additional sheets with the statement under penalty of perjury, each petitioner's signature under the statement and the name of attorney and petitioning creditor information in the format above.

Total Amount of  
Petitioners' Claims  
**769,212.98**

0 continuation sheets attached

06 May 05 04:33p

YMTHK

12345678

P. 1

6 MAY 2005 16:08

ENSENG HK LTD

WC. 677

P. 2

Form B5 (Official Form 5) Page 2 - (Rev. 11/03)

<b>Involuntary Petition</b>		Name of Debtor <b>FIGI LLC, a Delaware Limited Liability Company</b>	
<input checked="" type="checkbox"/> <b>TRANSFER OF CLAIM</b> Check this box if there has been a transfer of any claim against the debtor by or to any petitioner. Attach all documents evidencing the transfer and any statements that are required under Bankruptcy Rule 4008(a).			
<b>REQUEST FOR RELIEF</b> Petitioner(s) request that an order for relief be entered against the debtor under the chapter of title 11, United States Code, specified in this petition.			
Petitioner(s) declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information, and belief.			
X <u><i>Michael Lin</i></u> Signature of Petitioner or Representative (State Title) <u>Michael Lin</u> <u>6th May, 2005</u> Name of Petitioner Date Signed		X _____ Signature of Attorney Date Name of Attorney Firm (if any) Address Telephone No.	
Name & Mailing Address of Individual Signing in Representative Capacity <u>Michael Lin</u> <u>18/F, 29 Austin Road, TST, HK</u>			
X <u><i>Paul Siu</i></u> <u>Manager</u> Signature of Petitioner or Representative (State Title) <u>Paul Siu</u> <u>5/6/05</u> Name of Petitioner Date Signed		X _____ Signature of Attorney Date Name of Attorney Firm (if any) Address Telephone No.	
Name & Mailing Address of Individual Signing in Representative Capacity <u>Paul Siu</u> <u>97 Robinson Rd. HK</u>			
X <u><i>Chow Man</i></u> <u>Marketing Manager</u> Signature of Petitioner or Representative (State Title) <u>CHOW MAN</u> <u>May 6, 05</u> Name of Petitioner Date Signed		X _____ Signature of Attorney Date Name of Attorney Firm (if any) Address Telephone No.	
Name & Mailing Address of Individual Signing in Representative Capacity <u>CHOW MAN</u> <u>RM 517, 54 Hoi Yuen Rd, Kwun Tong, HK</u>			
<b>PETITIONING CREDITORS</b>			
Name and Address of Petitioner <b>Enseng (HK) LTD</b>		Nature of Claim <b>Outstanding orders Payment</b>	Amount of Claim <b>USD 138,270.12</b>
Name and Address of Petitioner <b>Venture Manufacturing Ltd</b>		Nature of Claim <b>outstanding orders Payment</b>	Amount of Claim <b>USD 165,476.55</b>
Name and Address of Petitioner <b>Glad Gem Industrial Ltd</b>		Nature of Claim <b>outstanding orders Payment</b>	Amount of Claim <b>USD 465,466.30</b>
Note: If there are more than three petitioners, attach additional sheets with the statement under penalty of perjury, each petitioner's signature under the statement and the name of attorney and petitioning creditor information in the format above.			Total Amount of Petitioners' Claims

\_\_\_\_ continuation sheets attached